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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Brandon Kotaniemi, individually and as special
co-administrator of the Estate of Marsha
Kotaniemi; Steven Kotaniemi, individually and
as special co-administrator of the Estate of
Marsha Kotaniemi,

,

Plaintiffs,

v.

Brian C. Ward, MD, an individual in his
official capacity; Stephanie Martinez, MD,
an individual in her official capacity; Emily
Tibbits, MD, an individual; Lisa Angotti,
MD an individual; State of Nevada ex rel
The Board of Regents of the Nevada System
of Higher Education ex rel the University of
Nevada, Las Vegas, a political subdivision;
DOE INDIVIDUALS I-X, inclusive; and
ROE CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:25-cv-00540-APG-MDC

**Stipulation and Order for Extension of
Time to Respond to Complaint**

(SECOND REQUEST)

Plaintiffs Brandon Kotaniemi and Steven Kotaniemi, through counsel and the
United States of America, on behalf of federal defendants, Emily Tibbits, MD and Lisa
Angotti, MD (“United States” and/or “Federal Defendant”), hereby stipulate and agree as
follows:

1. Plaintiffs filed their complaint in the Eighth Judicial District Court Clark County, Nevada on February 4, 2025.

2. Federal Defendant United States removed this case to the United States District Court, District of Nevada on March 24, 2025.

3. The Court granted a prior Stipulation and Order entered into between Plaintiff and the United States making the United States' response to the complaint due April 16, 2025 (ECF No. 9)

4. The parties stipulate and agree that the United States shall have through April 29, 2025, to file its response to the complaint.

5. United States' counsel has had multiple, conflicting deadlines such that she has been unable to coordinate with the parties to discuss the United States' response to the complaint and needs additional time to do so.

Therefore, the parties request that the Court extend the deadline for the United States to respond to Plaintiffs' complaint through April 29, 2025.

This stipulated request is filed in good faith and not for the purpose of undue delay.

Respectfully submitted this 15th day of April, 2025.

SIGAL CHATTAH
United States Attorney

THE POWELL LAW FIRM

/s/ Tom W. Stewart
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Attorney for Plaintiffs

/s/ Karissa D. Neff
 KARISSA D. NEFF
 Assistant United States Attorney
Attorneys for Federal Defendants

IT IS SO ORDERED:

Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
DATED: 4/16/2025